HFR-305

Date of Approval: JUL 2 1 2001

FREEDOM OF INFORMATION SUMMARY

NADA 141-230

PREVICOX Chewable Tablets (firocoxib)

For the control of pain and inflammation associated with osteoarthritis in dogs.

Sponsored by:

Merial Limited 3239 Satellite Blvd., Bldg. 500 Duluth, GA 30096-4640

e 141.230

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1. GENERAL INFORMATION:

a. File Number:

NADA 141-230

b. Sponsor:

Merial Ltd.

3239 Satellite Blvd., Bldg. 500

Duluth, GA 30096-4640 Drug Labeler Code: 050604

c. Established Name:

Firocoxib

d. Proprietary Name:

PREVICOX

e. Dosage Form:

Scored chewable tablets

f. How Supplied:

The product is available as 57 or 227 mg round half-scored

tablets in 60 count bottles and 10-count and 30-count

blister packages.

g. How Dispensed:

Rx

h. Amount of Active Ingredient:

Each tablet contains 57 mg or 227 mg firocoxib.

i. Route of

Administration:

Oral

j. Species/Class:

Dogs

k. Recommended

Dosage:

PREVICOX should be administered orally at a dose of 2.27 mg/lb (5.0 mg/kg) body weight once daily. The tablets are

scored and dosage should be calculated in half-tablet

increments.

1. Pharmacologic

Category:

Non-steroidal anti-inflammatory drug (NSAID)

m. Indications:

PREVICOX is indicated for the control of pain and inflammation associated with osteoarthritis in dogs.

2. EFFECTIVENESS:

a. Dosage Characterization:

A once daily oral dose of 5.0 mg/kg (2.27 mg/lb) body weight was selected based on the results of studies conducted in an experimental arthritis model.

In dose titration studies, dogs received a placebo control, 2.5, 5.0 or 7.5 mg/kg firocoxib orally ten hours prior to induction of arthritis. Force plate gait analysis and clinical assessments were performed prior to treatment, and 14 and 18 hours after treatment.

There was significant improvement in peak vertical force for all three firocoxib-treated groups when compared to placebo control group at 14 hours and 18 hours after treatment (p < 0.01). Peak vertical force after treatment with 5.0 mg/kg was 87.7% of full weight bearing baseline at 14 hours after treatment and 84.9% of baseline at 18 hours after treatment. The corresponding figures for the untreated control group were 0.0% at 14 hours and 33.0% at 18 hours. The dose response to firocoxib reached a plateau between 2.5 and 5.0 mg/kg, inclusive. Five mg/kg given once daily was selected as the dose for further study.

A second study was conducted in an experimental arthritis model with once daily oral administration of 5.0 mg/kg firocoxib. Force plate gait analysis and clinical assessments were performed prior to treatment, and at three and seven hours after treatment during the period of peak lameness.

There was statistically significant improvement in peak vertical force and clinical lameness scores for firocoxib-treated dogs when compared to placebo control group at both three and seven hours after treatment (p \leq 0.05). Peak vertical force after treatment with 5.0 mg/kg was 72.0% of full weight bearing baseline at three hours after treatment and 99.3% of baseline at seven hours after treatment. The corresponding figures for the placebo control group were 40.6% at three hours and 69.6% at seven hours. Clinical lameness scores for firocoxib-treated dogs also improved significantly as compared to placebo control group at both three and seven hours after treatment (p \leq 0.05). This study further supported the choice of 5.0 mg/kg firocoxib.

b. Substantial Evidence:

(1) Field Studies (PR&D 00535 and PR&D 00538)

Titles: PR&D 00535: A Study to Demonstrate the Efficacy, Safety and Acceptability of a ML-1,785,713 Oral Tablet in Dogs for the Control of Pain and Inflammation Associated with Osteoarthritis Under Field Conditions

PR&D 00538: A Study to Assess the Efficacy, Safety and Acceptability of ML-1,785-713 Oral Tablet in Dogs for the Control of Pain and Inflammation Associated with Osteoarthritis Under Field Conditions

(a) Types of Studies: Active-controlled, Masked, Randomized Field Studies

(b) Investigators:

Investigators and second	Locations
Drs. Bert Shelley and Roger Sifferman	Springfield, MO
Dr. K.C. Brooks	Lodi, WI
Drs. Michael Conzemius and Wanda Gordon	Ames, IA
Drs. Jerry Case, Carla Case McCorvey and	Savannah, GA
Melanie Bevere	
Dr. James Schuessler	St. Louis, MO

(c) General Design:

- 1 Purpose: The objective of these studies was to demonstrate, under field use conditions, the effectiveness, safety and acceptability of firocoxib for the control of pain and inflammation associated with osteoarthritis in dogs.
- 2 Test Animals: Two hundred forty-nine dogs of various breeds were enrolled. The dogs ranged in age from 11 months to 20 years and weighed from 6.3 to 175 lbs. Two hundred forty dogs were used in the effectiveness evaluation.
- 3 Active Control: ETOGESIC (etodolac), 150 mg or 300 mg tablets
- 4 Diagnosis: Enrolled dogs were diagnosed with osteoarthritis via recent radiographic evidence of degenerative or bony changes. The dogs also had lameness scores of at least 2 (on a scale of 0 = no lameness to 4 = non-weight bearing lameness) at a walk or trot, or a combined score of at least 3 for lameness at a walk or trot, plus pain on palpation, swelling, or range of motion (on a scale for each variable of 0 = not present to 3 = severe).
- 5 Dose Form: Final market formulation of PREVICOX Chewable Tablets for Dogs, either 57 mg or 227 mg tablets.
- 6 Route of Administration: Oral
- 7 Dosages used: 5.0 mg/kg body weight of firocoxib, administered orally once daily; 10-15 mg/kg body weight of the active control, administered orally once daily.
- 8 Treatment Duration: 30 days
- 9 Variables Measured: For all dogs enrolled in the studies, physical examinations and lameness evaluations were conducted by the Investigator at the initial visit (Day -6 to Day 0), at the midpoint (approximately Day 14), and at the study's end (Day 29 +/- 3 days). Hematology and serum chemistry were evaluated prior to enrollment and at Day 29 +/- 3 days (only for dogs in PR&D 00535). The primary variable of effectiveness was the percentage of subjective improvement at the study end point. Improvement (treatment success) was defined as one of the following:

a. Reduction of at least 1 grade in lameness score at a walk or trot,

and/or

b. A combined reduction of at least 2 grades in scores for pain on palpation or manipulation, range of joint motion, and joint swelling

Overall lameness, pain on palpation or manipulation, range of motion, and joint swelling were observed at the three scheduled times and scored as follows:

Overall Lameness Scoring (scored at a walk and a trot)

- 0 = No lameness
- 1 = Mild lameness (dog touched toe to floor on all strides)
- 2 = Moderate lameness (dog touched toe to floor on all strides)
- 3 = Severe lameness (dog touched toe to floor on at least 50% of strides)
- 4 = Non-weight bearing lameness (dog touched toe to floor on less than 50% of strides)

Pain on Palpation/Manipulation (most severely affected limb)

- 0 = No pain or not applicable
- 1 = Slightly painful (scarcely withdrew limb)
- 2 = Moderately painful (definitely withdrew limb)
- 3 = Severely painful (prominently withdrew limb)

Range of Motion (most severely affected limb)

- 0 = Normal range of motion
- 1 = Slightly reduced (less than 25% reduction in range)
- 2 = Moderately reduced (25% to 50% reduction in range)
- 3 = Severely reduced (greater than 50% reduction in range)

Joint Swelling (most severely affected limb)

- 0 =No swelling or not applicable
- 1 = Mild swelling (fibrosis or mild, palpable fluid distension)
- 2 = Moderate swelling (obvious, palpable fluctuant fluid distension)
- 3 = Severe swelling (pronounced, palpable fluctuant fluid distension)

Owners subjectively scored improvement from the initial visit on approximately Days 7, 14, 21 and 29. General health observations were also recorded daily by the owners. At the end of the study, owners assessed whether the tablet was convenient to administer, and if the tablet was palatable to the dog. Scoring of improvement was as follows:

Improvement

- 0 = Greatly improved from initial visit
- 1 = Moderately improved from initial visit
- 2 = Mildly improved from initial visit
- 3 =No improvement from initial visit

For the dogs enrolled in study PR&D 00535, peak vertical force during trotting was assessed by force plate gait analysis of the most severely affected limb at baseline (Day –2 to Day 0) and at study's end (approximately Day 29).

(d) Results:

Two hundred and forty nine dogs were enrolled in the studies. Two hundred forty dogs were evaluated for effectiveness. Safety data were collected on all dogs receiving treatment for any period.

Treatment with 5.0 mg/kg firocoxib orally once daily resulted in overall clinical improvement that was comparable to the active control at both study midpoint (Day 14) and endpoint (Day 29). Both treatment groups showed improvement from the initial visit. The results are summarized in Table 1.

Table 1. Veterinary Clinical and Non-Inferiority Evaluation

Percentage of Dogs with Overall Veterinary Clinical Improvement			Overall Veterinary Clinical		
Day 14 (Visit 2)	Day 29 (Visit 3)				
80.2% (97/121*)	87.6% (106/121)				
78.8% (93/118)	83.1% (98/118)				
1.4% (-7.4%)	3.8% (-3.9%)				
Yes	Yes				
	Overall Vete Impro Day 14 (Visit 2) 80.2% (97/121*) 78.8% (93/118) 1.4% (-7.4%)				

^{*}One case had missing data for Visit 2 since the examination was not performed within the time frame specified in the protocol.

Table 2 summarizes the percentage of dogs that showed improvement in the two components that formed the veterinary clinical evaluation. The first

component evaluated "lameness at a trot" and "lameness at a walk." In order for an animal to be classified as "improved" in the lameness component, it had to show a decrease of at least one grade on at least one of the two lameness variables. The second component of the clinical improvement evaluation evaluated "pain on palpation or manipulation," "range of motion," and "joint swelling." In order for an animal to be classified as "improved" in this component, it had to show an improvement of at least two grades in any of these three variables taken together. This could be demonstrated by either an improvement of two grades on one of the variables, or an improvement of one grade on two of the variables.

Table 2. Percentage of Dogs Showing Improvement in Veterinary Clinical Evaluation

	Percentage of Dogs that Showed Improvement		
Group	Lameness at a walk and lameness at a trot	Pain on palpation, range of motion, and joint swelling	
Visit 2			
Firocoxib	76.0% (92/121*)	55.4% (67/121)	
Active Control	76.3% (90/118)	43.2% (51/118)	
Visit 3			
Firocoxib	82.0% (100/122*)	63.9% (78/122)	
Active Control	78.8% (93/118)	47.5% (56/118)	

^{*}One case had missing data for Visit 2 since the examination was not performed within the time frame specified in the protocol.

Of the 249 dogs enrolled in the study, 172 dogs underwent force plate measurement of peak vertical force in gait. Of these, 164 dogs were included in the analysis. Eight dogs were excluded from the analysis for non-treatment-related reasons. Increased weight bearing on the affected limb, as measured by change in peak vertical force (Newtons/kilogram, N/kg) between the initial visit and study end, was comparable for firocoxib (0.15 N/kg; n = 87) and active control (0.20 N/kg; n = 80). The results are summarized in Table 3.

Table 3. Improvement in Peak Vertical Force on Day 29 (Visit 3)

Group	Percentage of Dogs with Improvement ¹
Firocoxib	14.1% (12/85)
Active Control	12.7% (10/79)
Test Article-Active Control (Lower Confidence Bound)	1.6% (-7.8%)
Is non-inferiority demonstrated? (Margin of difference is -15%)	Yes

¹The criterion for classifying a dog as "improved" was an increase of at least 0.74 N/kg (Newtons/kg) in the dog's mean peak vertical force on Day 29 compared with its mean peak vertical force at baseline. The criterion was calculated as two times the pooled within-dog standard deviation of 0.37 N/kg.

Based on once weekly owner evaluations, improvement between firocoxib and the active control was comparable at all time points (Days 7, 14, 21, and 29). The scoring scale and values for each response at each evaluation are summarized in Table 4. Both firocoxib and the active control were rated palatable (68.5% and 53.7%, respectively) and convenient to administer (97.2% and 87.2%, respectively) by owners.

Table 4. Results of Owner Evaluation of Improvement*

	Results of Owner Evalua	Firocoxib	Active Control
Time	Scoring		Tienve control
Day	0 = greatly improved	19.3% (23/119)	6.8% (8/116)
7	1 = moderately improved	21.0% (25/119)	18.1% (21/116)
	2 = mildly improved	39.5% (47/119)	48.3% (56/116)
	3 = no improvement	20.2% (24/119)	26.7% (31/116)
Day	0 = greatly improved	20.8% (25/120)	8.5% (10/118)
14	1 = moderately improved	33.3% (40/120)	31.4% (37/118)
17	2 = mildly improved	31.7% (38/120)	
	3 = no improvement	` ,	38.1% (45/118)
	5 – no improvement	14.2% (17/120)	22.0% (26/118)
Day	0 = greatly improved	28.3% (34/120)	10.2% (12/118)
21	1 = moderately improved	33.3% (40/120)	35.6% (42/118)
	2 = mildly improved	25.8% (31/120)	34.7% (41/118)
	3 = no improvement	12.5% (15/120)	19.5% (23/118)
Day	0 = greatly improved	22 99/ (20/110)	16.09/ (20/119)
29	0 = greatly improved	32.8% (39/119)	16.9% (20/118)
29	1 = moderately improved	31.1% (37/119)	32.2% (38/118)
	2 = mildly improved	23.5% (28/119)	28.8% (34/118)
	3 = no improvement	12.6% (15/119)	22.0% (26/118)
	L		

^{*}Not all dogs were evaluated at each time point by the owners.

Minimal clinicopathologic changes were not treatment-related nor associated with clinical disease. The number of dogs with possible gastrointestinal (GI) tract-associated blood and protein loss was similar in both treatment groups (two firocoxib and three etodolac-treated dogs). These dogs had a minimum of three of the following findings: decreased red blood cell count, decreased hematocrit, increased or decreased mean corpuscular volume, decreased albumin, decreased globulins, and decreased total protein. One firocoxib-treated dog had a two-fold increase in neutrophils. One firocoxib-treated dog also had a two-fold increase in baseline BUN and creatinine (creatinine was 1.5 times normal reference range values). Hypocalcemia was noted in one firocoxib-treated dog and one etodolac-treated dog (Day 29 values were below normal reference range values for both dogs).

(e) Statistical Analysis:

The primary effectiveness variable was the incidence of veterinary clinical improvement at study end. Comparison of treatments for incidence of clinical improvement was performed as a non-inferiority comparison, with a one-sided lower 95% confidence limit. Improvement at study midpoint was also analyzed. Improvement was defined as: 1) Reduction of at least one grade in lameness score at a walk or a trot, and/or 2) Combined reduction of at least two grades in scores for pain on palpation or manipulation, range of motion, and joint swelling. Improvement was then assigned a value of "1" if improved or "0" if not improved.

Secondary effectiveness variables included veterinary scores for lameness at a walk or a trot, pain on palpation or manipulation, range of motion, and joint swelling, and the owner's assessment of improvement.

Analysis of peak vertical force was made based on the mean of valid observations on the designated limb. A dog was classified as "improved" if its peak vertical force increased from its baseline by at least two times the pooled within-dog standard deviation, obtained from repeated force plate trials. A non-inferiority evaluation was used to compare the incidence of improvement of firocoxib-treated dogs with active control-treated dogs, using a margin of -15%, as previously described for the overall clinical evaluation of improvement. The incidence of overall clinical improvement with firocoxib was within the margin of difference established for the non-inferiority comparison with the active control.

(f) Conclusions:

In field studies, firocoxib was shown to be safe and effective when administered at 5.0 mg/kg orally once daily for the control of pain and inflammation associated with osteoarthritis in dogs. Owners found chewable firocoxib tablets both convenient to administer (97.2%) and palatable (68.5%) to their dogs.

(g) Adverse Reactions:

Adverse reactions were reported in both treatment groups during the studies. Vomiting and decreased food consumption were the most common clinical adverse events seen in both the firocoxib and active control groups.

Table 5.	Adverse	Reactions	Seen Dur	ing the	TIS	Field Studies
1 4010 20	11410150	1 CUCUOUS	JUU DUI	me me	-	Ticiu Studies

Adverse Reactions*	Firocoxib n=128**	Active Control n=121**
Vomiting	5	8
Decreased food	3	3
consumption/Anorexia		
Pain	2	1
Diarrhea	1	10
Lethargy	1	3
Somnolence	1	1
Hyperactivity	1	0
Melena	0	3
Stomatitis	0	1
Icterus	0	1
Constipation	0	1
Drooling	0	1
Alopecia	0	1

^{*}Dogs may have experienced more than one adverse event during the study.

3. TARGET ANIMAL SAFETY

- a. PR&D 0078601: A Study to Evaluate the Safety of Firocoxib Administered to Dogs in an Oral Chewable Tablet Formulation at 1, 3, and 5X the Recommended Dose
 - (1) Type of Study: Laboratory Study
 - (2) Investigator: Marlene D. Drag, DVM, MS, DACLAM

Merial-Missouri Research Center

Fulton, MO

(3) General Design:

- (a) Purpose: To determine the safety of firocoxib administered to dogs orally once daily at 1, 3, and 5X the recommended dose of 5 mg/kg for six months.
- (b) Test Animals: Thirty-two Beagle dogs (16 male and 16 female, ranging in weight from 7.70 to 14.75 kg, and in age from 7 to 10.9 months) were randomly assigned to four treatment groups (eight dogs per group).
- (c) Control: Control dogs were not medicated.
- (d) Dose Form: Scored tablets containing either 57 mg or 227 mg of firocoxib in the final market formulation
- (e) Route of administration: Oral
- (f) Dosage: Table 6 lists the treatment groups and the dose used for each:

^{**&}quot;n" represents the total number of dogs in the treatment group.

Table 6. Treatment Groups

Treatment Groups	Dose, mg/kg	Number and Sex Of Animals
1	0	4 male and 4 female
2	5 mg/kg (1X)	4 male and 4 female
3	15 mg/kg (3X)	4 male and 4 female
4	25 mg/kg (5X)	4 male and 4 female

- (g) Duration of Treatment: Six months
- (h) Variables measured: Physical examination, general and post-dosing observations, food consumption, palatability, body weight, clinical chemistry, coagulation, hematology, plasma levels of firocoxib, urinalysis, gastric endoscopy, and gross (all animals) and histopathologic evaluation (controls and 5X animals)

(4) Results:

One dog in the 3X dose group was diagnosed with juvenile polyarteritis of unknown etiology after exhibiting episodes of vomiting and diarrhea, lethargy, pain, anorexia, ataxia, and proprioceptive deficits. Other clinical signs in this dog included elevated white blood cell counts, decreased and then increased platelet counts, decreased albumin levels, increased bleeding times, and elevated liver enzymes.

Decreased appetite/anorexia, vomiting, and diarrhea were seen in all dogs in all dose groups, including unmedicated controls, although vomiting and diarrhea were seen more often in dogs in the 5X dose group.

On histopathologic examination, a mild ileal ulcer and a focal hemorrhage in the heart was found in one 5X dog. This dog also had a transient elevation in white blood cell count and platelet count, and a transient decreased serum albumin, which returned to normal by study completion. One control and three 5X dogs had focal areas of inflammation in the pylorus or small intestine. Thalamic vacuolization was seen in two 5X group dogs, one 3X dog, and in two control dogs. The lesions were more severe in the 5X dogs. External thalamic capsular vacuolization was also seen in one control dog and in one 5X dog.

Sporadic incidences of increased white blood cell counts and decreased albumin were seen in all dose groups, including controls, but were seen at a greater frequency in the 3X and 5X groups. Mean ALP was within the normal reference range for all groups, but was statistically significantly greater in the 3X (p = 0.0269) and 5X (p = 0.0816) dose groups than in the control group.

Analysis of plasma levels of firocoxib indicated that the drug was absorbed and systemically available at all doses. Plasma concentrations increased with dose, and were approximately proportional to dose over the dose range.

- (5) Conclusions: This study demonstrated the safety of long-term administration of firocoxib in dogs over seven months of age. Dogs administered firocoxib once daily at the recommended dose for 180 days showed no clinically significant adverse events. At higher doses, transient hypoalbuminemia, leukocytosis, and elevations in ALP were reported. On histopathologic examination, a mild ileal ulcer was found in one 5X dog.
- b. PR&D 0054101: A Safety Study to Evaluate the Toxicity of Firocoxib Oral Chewable Tablet Formulation Administered to Dogs at 1, 3, and 5X the Maximum Label Recommended Dose
 - (1) Type of Study: Laboratory Study
 - (2) Investigator: Sarah Nolan Smith, BSc, CBiol, MIBiol Covance Laboratories Europe, Ltd. North Yorkshire, HG3 1PY, United Kingdom
 - (3) General Design:
 - (a) Purpose: To determine the safety of firocoxib administered to dogs orally once daily at 1, 3, and 5X the recommended dose of 5 mg/kg for six months.
 - (b) Test animals: Thirty Beagle puppies (15 male and 15 female, ranging in age from 10-13 weeks at study start, and weighing 2.59-4.57 kg) were randomly assigned to five treatment groups (3 dogs per sex per treatment group). Table 7 lists the treatment groups, their doses, and the number of animals per group. Group E was intended to be a recovery group to examine the reversibility of lesions following 180 days of treatment and an additional 60 days without treatment.

Table 7. Treatment Groups

Treatment Group*	Dose (mg/kg)	Number and Sex of Animals
Α	0	3 males and 3 females
В	5 mg/kg (1X)	3 males and 3 females
С	15 mg/kg (3X)	3 males and 3 females
D	25 mg/kg (5X)	3 males and 3 females
Е	25 mg/kg (5X)	3 males and 3 females

- (c) Control: Control puppies were not medicated.
- (d) Dose Form: Scored chewable tablets containing 57 mg or 227 mg firocoxib (final market formulation)
- (e) Route of administration: Oral
- (f) Dosage: Each puppy's weight was multiplied by the desired dose multiple (for example 1 x bw, 3 x bw, 5 x bw where bw is the animal's body weight). Each dog was then dosed according to Table 8.

Table 8. Dosage Administration Table

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TABLET SIZE/ ACTUAL			
DOSE			
½ tablet 57 mg (12.3-5 mg/kg)			
(1) 57 mg tablet (9.8-5 mg/kg)			
½ tablet 227 mg (9.9-5mg/kg)			
(1) 227 mg tablet (9.9-5			
mg/kg)			
Appropriate tablet combination			

- (g) Test duration: One hundred and eighty days (six months)
- (h) Variables measured: Body weight, physical examination, post-dosing observations, plasma firocoxib levels, clinical chemistry and hematology, buccal mucosal bleeding times, urinalysis, gastric endoscopy, and gross and histopathologic evaluation
- (4) Results: Four moribund puppies (one of six treated at 3X on Day 63, and three of twelve treated at 5X the indicated dose on Days 38, 78, and 79) were euthanized because of anorexia, weight loss, depression, and in one dog, vomiting. One puppy treated with firocoxib at 5X died on Day 82. The 3X puppy that was euthanized also had a decreased serum albumin. Two of the five animals that died or were euthanized had elevations in liver enzymes; these two animals were in the 5X dose group. One puppy had ingested a rope toy, which may have contributed to its demise.

When examined at necropsy and by histopathology, these five puppies all had moderate to severe periportal hepatic fatty change, two had duodenal ulceration, and two of the puppies also had pancreatic edema. One of these puppies had renal casts and one had renal hyaline droplets, although no corresponding lesions were seen on histopathology.

The remaining four 5X puppies from dose group D and two control puppies, all clinically normal, were euthanized to serve as comparisons to the ill animals. Two of these 5X puppies had periportal hepatic fatty change. One 5X puppy had focal nephropathy.

On average, the puppies in the 3X and 5X dose groups did not gain as much weight as controls. Rate of weight gain was measured (instead of weight loss) because these were young growing dogs.

On day 83 of the study, dosing was discontinued for all puppies in both 5X dose groups. The four surviving puppies from 5X dose group E continued unmedicated for the remainder of the study (14 weeks). They had no significant lesions at necropsy at 180 days.

At 5 mg/kg, three out of six puppies had minimal periportal hepatic fatty change at necropsy, following 180 days of treatment. These animals showed no antemortem clinical signs or liver enzyme elevations. In the 3X dose group, three of the five surviving puppies had minimal periportal hepatic fatty change, one had pancreatitis, one had cystitis, and one had caecitis. Thalamic vacuolization was seen in three of six puppies in the 3X group and five of twelve puppies in the 5X groups. Diarrhea was seen in all dose groups.

- (5) Conclusions: At 5 mg/kg, firocoxib treatment was associated with subclinical periportal hepatic fatty change in puppies less than seven months of age. At higher dose groups in this age dog, duodenal ulceration, hepatic fatty change, decreased weight gain, and decreased serum albumin were observed. One of twelve 5X puppies died and one of six 3X and three of twelve 5X puppies developed serious adverse reactions such as vomiting and depression, requiring euthanasia. The severity of the adverse reactions at the 3X and 5X doses, and the subclinical periportal hepatic fatty change in three of six puppies treated at the indicated dose, suggest that the drug may not be safe in young dogs. Furthermore, thalamic vacuolization was seen in three of six puppies in the 3X group and five of twelve puppies in the 5X groups. The clinical significance of this change is unknown.
- c. PR&D 0053301: A Safety Study to Evaluate the Tolerance (10X) of Dogs to Firocoxib Chewable Tablet
 - (1) Type of Study: Laboratory Study
 - (2) Investigator: Marlene D. Drag, DVM, MS, DACLAM

Merial-Missouri Research Center

Fulton, MO

(3) General Design

- (a) Purpose: To evaluate the safety of firocoxib in dogs at ten times the indicated dose for 22 days.
- (b) Test Animals: Six Beagle dogs, three males and three females, ranging in age from 11-14 months old, weighing 10.6 to 13.25 kg body weight
- (c) Control: Control animals were not medicated.

- (d) Dose Form: Firocoxib in 57 mg and 227 mg scored tablet sizes (final market formulation)
- (e) Route of Administration: Oral
- (f) Dosage: The treatment groups, doses used, and numbers of animals per group are described in Table 9.

Table 9. Treatment Groups

Treatment Group	Dose mg/kg	Number and Sex of Animals
1	0	2 (1 male and 1 female)
2	10X (≥50 mg/kg)	4 (2 male and 2 female)

- (g) Test Duration: Twenty-two days
- (h) Variables measured: Body weight, food consumption, physical examination, post-dosing observations, hematology and clinical chemistry, buccal mucosal bleeding times, urinalysis, gastric endoscopy, and gross and histopathologic evaluation.
- (4) Results: All dogs survived to the end of the study. Three of four treated dogs developed small intestinal erosion or ulceration. Treated dogs that developed small intestinal erosion or ulceration had a higher incidence of vomiting, diarrhea, and decreased food consumption/anorexia than control dogs.

One of these treated dogs developed a severe duodenal ulceration, with centrolobular hepatic fatty change and associated vomiting, diarrhea, anorexia, weight loss, ketonuria, and elevations in AST and ALT. All four treated dogs exhibited progressively decreasing serum albumin that, with the exception of one dog that developed hypoalbuminemia, remained within normal range. Mild weight loss also occurred in the treated group. One control dog and three treated dogs exhibited transient increases in ALP that remained within normal range.

(5) Conclusions: Firocoxib administered at ten times the recommended dose (50 mg/kg) for 22 days resulted in small intestinal erosion or ulceration, decreased food consumption/anorexia, mild weight loss, sporadic vomiting and diarrhea, and decreased serum albumin in three of four treated animals. Increased in liver enzymes and ketonuria were observed in treated dogs. Hepatic fatty change was confirmed in one dog.

4. HUMAN FOOD SAFETY

This drug is intended for use in dogs which are non-food animals. Because this new animal drug is not intended for use in food-producing animals, data on human food safety pertaining to drug residues in food were not required for approval of this NADA.

Human Warnings are provided on the label as follows: "Warnings: Not for use in humans. Keep this and all medications out of reach of children. Consult a physician in case of accidental ingestion by humans. For use in dogs only."

5. AGENCY CONCLUSIONS

The data submitted in support of this NADA comply with the requirements of Section 512 of the Federal Food, Drug, and Cosmetic Act and 21 CFR Part 514 of the implementing regulations. The data demonstrate that PREVICOX (firocoxib) Chewable Tablets, when used under the labeled conditions of use are safe and effective for the control of pain and inflammation associated with osteoarthritis in dogs.

PREVICOX (firocoxib) Chewable Tablets are restricted to use by or on the order of a licensed veterinarian because professional veterinary expertise is needed to diagnose canine osteoarthritis and to monitor response to treatment.

Under Section 512(c)(2)(F)(i) of the Federal Food, Drug, and Cosmetic Act, this approval qualifies for FIVE years of marketing exclusivity beginning on the date of approval because no active ingredient of the new animal drug has previously been approved.

U.S. Patent Number	Date of Expiration
5,981,576	October 9, 2016
6,541,646	October 8, 2019
6,677,373	October 8, 2019

6. ATTACHMENTS

Facsimile labeling is attached as indicated below:

- a. Package insert for both 57 mg and 227 mg tablet sizes
- b. Client Information Sheet for PREVICOX Chewable Tablets, 57 mg and 227 mg tablet sizes
- c. Bottle label for 60 count bottle for both 57 mg and 227 mg tablet sizes
- d. 30 count blister backing label for both 57 and 227 mg tablet sizes
- e. Carton labels for 30 count blister packages for both 57 and 227 mg tablet sizes
- f. 10 count blister backing label for both 57 and 227 mg tablet sizes
- g. Carton labels for 10 count blister packages for both 57 and 227 mg tablet sizes
- h. Display trays for 10 count and 30 count blister packages for both 57 and 227 mg tablet sizes
 - i. Shipping label for 60 count bottles of 57 and 227 mg tablet sizes
 - j. Shipping label for 30 count blister cartons of 57 and 227 mg tablet sizes
 - k. Shipping label for 10 count blister cartons of 57 and 227 mg tablet sizes

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Control of the contro of car as fwhice the form in another to the sin entirias comparable to the artire control

2 i to 24m > PREVICOX™ Chewable Tilo 1ts were lated both comment to in its 2 ± 0 2% and palarable to the divid (66.55) by owners in multi-center late it is reviewing client owned dogs of various breats and sizes.

ormo Schety in a targint animal sahity study, tirocook was administered a. to taliffly adult Recipio obos kiroth dra. per or wuly at 5,15 and 25 mg/kg ar (5 times the recommended total daily obely for 180 days. At the later cook of 5 mg/kg there were no treatment dated adverse events rasi c alipetite, vomiting, and diarrhea were seen in dogs in all dose groups. In unnecessarily was worked with a second of the second of It jush his polyatherth of unknown eloology after a ribbiting recurrent elections in mining statement with the polyather and the polyather and a statement of the polyather and a statement of the polyather and a statement of the polyather and a create term was found in more \$X roop. The dog a few had a decreased derum of Linium was returned to normal by story competion. The control and three \$X roop. The dog a few had a decreased derum of Linium was returned to normal by story competion. The control and three \$X roop is a few and the polyather and

 1 apparate safety study flocowib was administered draily to healthy juvenule
 3 weeks of age) Beagle dogs at 5-15, and 25 n.g.kg (1, 3, and 5 times the
 nomen text total daily dose) for 180 days. At the indicated (1X) dose of 5. FT / C. OR histopathologic examination, three out of six doos had minimal re is attained attournment examination of the document of the document of the state 5" well of childs signs and had not liver enzyme elections. In the 3X dose 9 us not adjust sectionated because of soor clinical condition (189 63). This 1" is not at a mildly decreased serum albuman. At study controlleron, and of live 1" mildly decreased serum albuman. At study controlleron, and of live 1" in an albuman at 10 kg sp. thee tall minimal persports leptic tally 1" in an albuman at 10 kg sp. the and 79 libecase of anonese, poor 1" in an albuman at 10 kg sp. that 1" is an arbitraried dogs 1" in a special at rope toy. Two of these 5X dogs fact mildly elevated liver analyses 1" in an arbitraried at 1" in a special an into law plant reside between the two other cellification formal as X copy (but of the intended as comparation to the clinically affected freely nine has digital and 13 and moderate persportal hepatic faity change. Drug treatment was 5 continued for four dogs in the SX group. These adapts survived the remaining 4 whelex of the study. On average, the dogs in the LX and SX does groups dog pair as much weight as control dogs. Rate of verifying dain was measured in the study of the study o he mea was seen in all dose groups, including unmedicated controls

1. I sparalle does tolerance safely study, involving a tital of six does five control logs and lover freated does, incocoult was administered to four healthy adult leagle does at 50 mg/kg from these the recommender day does for twenty-two lays. All does survived to the end of the study. Three of the four treated does sent processed and intestinal encosion or useration freated does test developed mail intestinal encosion or useration that a higher incidence of vioriting, giarnites of certained food consumption that a hoppier incidence of vioriting, distribution of certained food consumption with hepatic faity change and associated vioriting in that, and read experts and some data. All the study weight loss, identificial, and must deliverate in AST and AST a 1 is separate dose tolerance safety study involving a total of six doos five control

torage. Store at room temperature, between 59°-36° F (15°-30° C). Bnef enods up to 104° F (40° C) are permitted.

o Request a Material Safety Data Sheet (MSDS), call 1 866-638-2226

fow Supplied PREVICOX™ is available as round beings to tan, half-scored libers in two strengths, containing 57 mg or 227 mg incodes Each tablet rength is supplied in 10 count and 30 count brists packages and 60 count order.

Willoughby DA, Moore AR and Cotylie Nash PR. COX 1. COX-2, and COX-3 and the future sament of chronic inflammatory disease. Lancet 2000; 355:545-648.

Smith, et al., Pharmacological Analysis of Cyclo-corponase-1 in Inflammation. Proc. Natl. cad. USA, Pharmacology 1998, 95:13313-13318.

Jones CJ and Budsberg SC Physiologic characteristics and clinical importance of the iclosygenase isoforms in dogs and cats. JAVMA 2000 217(5) 721 729

Zhang, et al., Inhibition of Cyco-oxygenase-2 Rapidty Revenue int nd Prostaglandin E₂ Production. JPET 1997. 283 1069-1075.

Two messagements promotions when their 28th 1004-1075. Since and Buddeng op 727 725. Zang et al. pp 1069-1075. Chandrasethams MV, Dei H et al. COX 3, a cyclocopymises 1 variant inhibited by reasonopmen and other analyses/antopietic drugs. Closing structure and excreasion. For Mark Acad Sci. EXC. 2002.96(21) 13967-13931.

lanufactured for Merial Limited 239 Satellite BMd ulutin, 03 30096-4640, U.S.A. 1866-638-2256, S. Patent Nos. 5 981,576, 6 541,646, and 6 677,37.

4DA 141-230 Approved by FDA © 2004 Menal Limited All Rights Reserved 3EVICOXTM is a trademark of Menal Limited

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The sale use of PREWIDDA - Of twildle Tablets in pregnant factating or sheading dogs has not been evaluated

Adverse Reactions In - In rollet field studies 128 dags ages 11 months to 15 yeard) ware evaluated fur salety which given PREWCOXTM Drevable Tablets at a date of 5.0 mg/s/c darvi on e dark for 30 days. The following adverse reactions were observed adverse reactions. If you have experienced more than one of the observed adverse reactions.

Adverse Reactions	Previcox*** n=128	Active Control
Vomiting	5	8
Diarrhea	1	10
Decreased Appet te or Anorexia	3	3
Lethargy	1	3
Pain	2	
Somnolence	1	1
11		

PREVICOXTM iffrocoxib) Chewable Tablets were safely used during field studies concomitantly with other therapies, including vaccines anthelminties and

Clinical Pharmacology Mode of action PREVICON** ifirecoxibilities a Clinical Pharmacology. Mode of action PREVICON.** Infocusib is a optionorgenate-inhibiting locally class, non-nacional not attention an inflammatory group (NSAID) with art inflammatory and analgesic properties. There are two main cyclico-genates enzymes, COX-1 and COX-2 and a newly accepted that enzyme. COX 4 which has yet to be tuly, characterized: Cycloorgenase in (COX-1) is the enzyme responsible for facultating constatute physiologic processes, e.g. platefall agreeging, agent microses protection, and reral perfusion.² It also is constitutively expressed in the brain spinal cord and enzymetry mediators. Full 1's a so constitutively expressed in the brain spinal cord and denings. 4" 5" 6" (conorgenase 3" (COX-2) is expressed in the brain spinal cord and denings. 4" 5" 6" (conorgenase 3") (COX-3") is also constitutively expressed in the came and human brain and also the human heart. Fesu is from in virto studies showed finocools to the nightly selective for the COX-2 engine.





Dog Owners about xio) Chewable Tablets

- bate parthritis pain and inflammation in your dog.
- consider read this information before you start giving your dog PREVICOX is rovided only as a summary and does not take the place of instructions this in completion or unit want to know more about PREVICOX

1 ations out of the reach of children Call your physician immediately if you

actions, including death, have been associated with PREVICOX administration

- Who State Co. it () (N 3/LID) used to control pain and inflummation due to osteoarthitis in to cardage and other parts of the joints that may result in the following
 - in per rim, or difficulty in performing these activities)

is on PREVICOX for ostegarthritis?

an and inflammation may return

il flor itchy skin) to aspirin or other NSAIDs

What ke diof result

1 1155 x

+ig PREVICOX

ven months of age

or has had in the past

r hav have another medical problem

a problems is aspirin

Las limping or stiffness hrits

- # 1 0 000 170 els 1 0 000 170 els 1 8 (xish(xit))

Which dogs should to the

PREVICOX should on . . . q. et Seople should not take Pill a crosmary ake PREVICOX

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Tell your veterinanan about

- Any other medical problems of all 12 and a second medical problems of a second medical problems of a second medical problems
- Tell vous veterinarian if your do : . Is pre nant nursing o it is it.

How to give PREVICOX to yout (1) |
PREVICOX should be given as core by to your or your your your one or your your your young without first speaking with your veterinarian. If a z + 0 m is a mount of PREVICOX is right for your dog and for how long it should be given Most dogs will take PREVICOX to your dog. If you can place the tablet in your dog is mouth. PREVICOX may be given with or without food

I luding those you can get without a prescription and any dietary supplements

PREVICOX: like other NSAIOS, mar. (au. so i i s. 4) warning, and, in rare situations, i suf ir di i s. 6) (vomiting and decreased food cor sam t.ot.) i that may indicate your dog is havi i a ir blis. 4.1

- . Decrease or increase in andellin

- Decrease of increase in unfert e
 Vorning
 Change in blowel movements (Junias 1 0 1 1 r or bloody stools)
 Change in behavior duch as a serie of end in size of the series of general properties of the series of the series of general properties of the series of the seri

- Unexpected weight loss

It is important to stop therapy and compact in the service of a diately if you think your dog has a medical problem or side effects while taking PREVICOX tablets. If you have and horizing to the compact of the service of the servic

spirin, carprofen, etodolac, deracoxib, melokicam, or tepoxalin) or corticosteroids

Can PREVICOX be given with order 1 c 1 a ons? PREVICOX should not be given with order 1 1 5 c 1 c spinn, c (for example, prednisone, cortisone detain 1 c 1 c c c c) a one)

Tell your vetermanan about all minimations to the risk of the risk of the past, and any medications you are planning to give with PREVICOX tablets. This should include other medicine in think of the control to the that all of your dogs medicines in him your factor.

What do I do in case my dog + 115 m $_{\rm T}$ ha $_{\rm I}$ the prescribed amount of PREVICOX? Consult your veterinarian immedial ely $_{\rm I}$ for $_{\rm ICM}$ and $_{\rm ICM}$ the prescribed amount of PREVICOX

- What else should I know about I PREVIC. At 2

 This sheet provides a summary of a formation and the following should prescribed as summary of a formation and the following should only one to the dog for which they were prescribed. They should be given to your dog only for the condition for with a first were sent and at the prescribed dose.

 It is important to periodically discussly and they were sent and anyour dog should continue easy by PREVICOX tablets. Your veterinarian will determine if your dog is responding as expected and if your dog should continue easy is a victory.

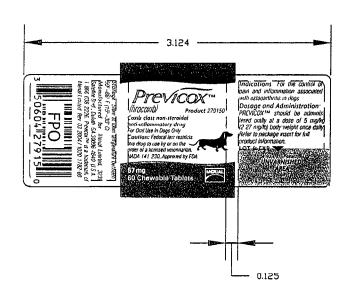
For technical assistance or to report sury interliadverse reactions, call 1-866-638-2226.

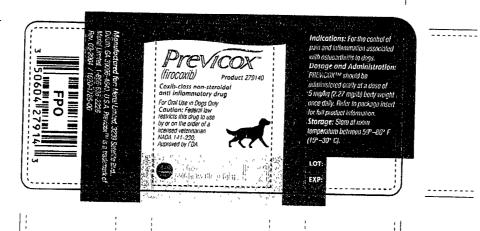
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1050-1727-00









Chewable Tablets 57 mg

Not for use in humans. Keep this and all drugs out of the reach of children.

Consult a physician in case of accidental ingestion by humans.

For use in dogs only.

Store at room temperature between 59° and 86°F (15°–30°C).

Merial Limited, 3239 Satellite Blvd., Duluth, GA 30096-4640, U.S.A.

1077-1749-00 Rev.03-2004



Previousibly (Infocoxia)

Chewable Tablets

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57mg 30 Chewable Tablets



AOF Vd beyondga ,085-141 AOAN to use by or on the order of a acensed veterinarian. For Oral Use in Dogs Only Coution: Federal law restricts this driig Coxib-class non-steroidal anti-inflammatory drug

PYEVICOX "

Previcox-

Product 279120

Indications: For the control of pain and inflammation associated with osteoarthrills in cogs.

Dosage and Administration: PREVICAXI^M should be administered orally at a dose of 5 mg/kg (2.27 mg/lb) body weight once daily. Refer to paskage insert for full product information.

Warnings: Not for use in humans. Keep this and all medications out of the reach of children. Consult a physician in case of accidental ingestion by humans. For use in dogs only.

Storage: Store at room temperature between 59°-86° F (15°-30° C). Brief periods up to 104° F (40° C) are permitted.

Manufactured for: Merial Limited, 3239 Satellite Blvd., Dululli, GA 30096-4640, U.S.A. 1-866-638-2226

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30 Chewable Tablets

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Hard-Limited, a company finited by stares reach and to Employ and West (enjoined rumber 333/751) with a registered effice of PO Box 327. Sundrightem Hasse, Sundrightem Assaum, (across Park Harboy, Esser CH19 516, Employ, and

1030-1783-00 Rev 03-2004



PATHEON GMP CODE

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57 mg

Previcox

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Chewable 30









AADA 141-230, Approved by FDA drig to use by or on the order of a licensed veterinarian For Oral Use in Dogs Only Coution: Federal law restricts tins Coxib-class non-steroidal anti-inflammatory drug

(tirocoxib)

Previous

stalds Chewable

30



"XOOINƏLA

Previcox" (firocoxib)

Product 279130

Indications: For the control of pain and inflammation associated with osteoarthrits in dogs.

Dosage and Administration:

PREVICOX[™] should be administered orally at a dose of 5.0 mg/kg (2.27 mg/lb) body weight once dally. Refer to package insert for full product information.

Warnings: Not for use in humans. Keep this and all medications out of the reach of children. Consult a physician in case of accidental ingestion by humans. For use in dogs only.

Storage: Stora at mom temperature between 59°–86° F (15°–30° C). Balef periods up to 104° F (40° C) are permitted.

Manufactured for: Merial Limited, 3239 Satellite Blvd., Duluth, GA 30096-4640, U.S.A. 1-866-638-2226

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Meral United, a corrospy limited by obsess resistend in Empard and Maks (mostored minbar 333275f) with a resistand office at PO Bat 127, Scalinghum Haise, Sundrighum Alemar, Hallow Business Park, Hallow, Essex (CHI) 51G, England, and domestizated in Duzware, USA as Marel LLC.

1030-1784-00 Re: 03-2004



PLACE PATHEON GMP CODE

Previcox



Chewable Tablets 57 mg
Not for use in humans. Keep this and all drugs out of the reach of children.
Consult a physician in case of accidental ingestion by humans.

For use in dogs only.
Store at room temperature between 59° and 86°F (15°-- 30°C).

Merial Limited, 3239 Satellite Blvd., Duluth, GA 30096-4640, U.S.A.

1077-1749-00 Rev. 03-2004





LOT & EXP

Chewable Tablets 227 mg

Not for use in humans. Keep this and all drugs out of the reach of children. Consult a physician in case of accidental ingestion by humans. For use in dogs only.

Store at room temperature between 59° and 86°F (15°–30°C). Merial Limited, 3239 Satellite Blvd., Duluth, GA 30096-4640, U.S.A.

1077-1751-00 Rev. 03-2004



Previcox -

10 Chewable Tablets

57 mg

57 mg

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Manufactured for: Aferial Limited, 3239 Salellite Bl.d., Duluth, CA 30096-4640, U.S.A.

2101036: Store at room temperature between 59°-86° F. (15°-30° C) are permitted.

Wornings: Not for use in humans, keep this and all medicalons out of the reach of childran. Consult o physicion in case of accidental ingestion by humans. For use in dags only.

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Previcox

Lot & Exp

PATHEON GMP CODE

Previcox"

10 Chewable

Tablets

Coxib-class non-steroidal anti-inflammatory drug For Oral Use in Dogs Only Caution Federal law restricts this drug to use by or on the order of a licensed veterinarian NADA 141-230, Approved by FDA



57mg 10 Chewable Tablets



57 mg

Previcox" Chewable Tablets

Wornings: Not for use in humans, Keep this and all medications by humans. For use in dogs only, Was for use in humans, Keep this and all medications by humans. For use in dogs only, PREVICOX™ should be adminislencd orally at a dose of 5.0 mg/kg (2.27 mg/lb) body weight once daily. Refer to package insert for full product information.

For the control of pain and inflammation associated with osteoarthius in dogs.

Product 279170

Dosage and Administration:

10 Chewable Tablets

10 Chewable Tablets

Lot & Exp

Previcox

1030-1726-00 1030-1726-00

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MEHIVE



Chewable **Tablets**

Previcox"

PLACE PATHEON GMP CODE

MERIAL





PFOVOXIO 57 mg Chewable Tabler

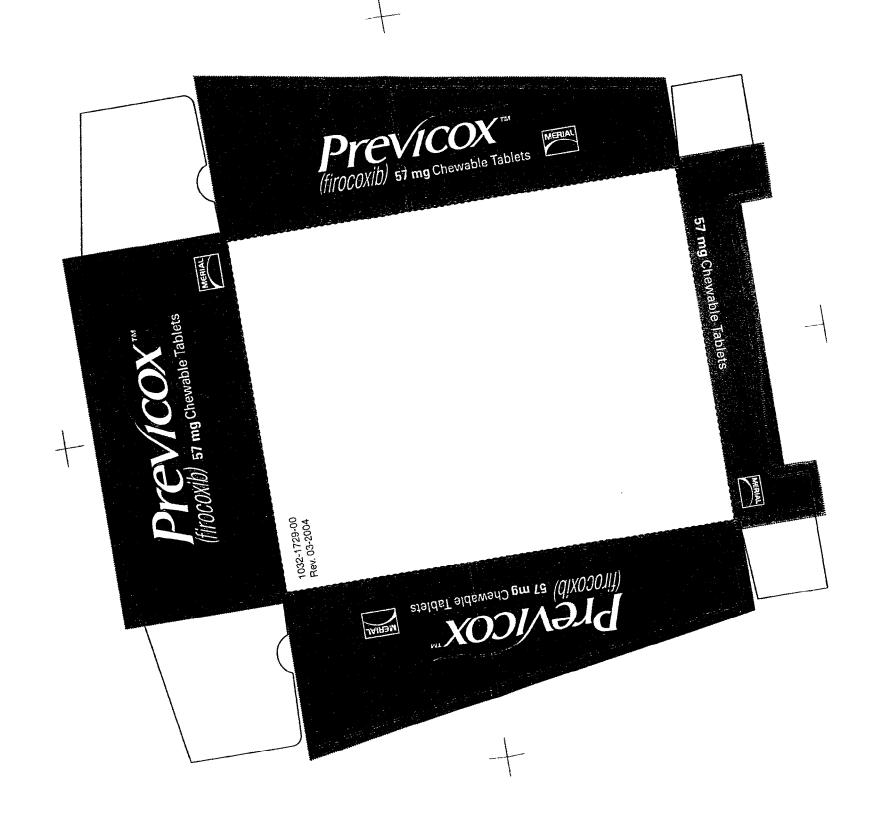
1032-1729-00 Rev. 03-2004

MERIAL



(IIVOCOXID) 57 mg Chewable Tablets

8.5625



MERIAL





PTEVICOX TW (fil/OCOX/ib) 227 mg Chewable Tablets

1032-1731-00 Rev. 03-2004



(firocoxib) 227 mg Chewable Tablets



PREVICOXTM (firocoxib) 57mg Chewable Tablets

Contains:

24 Bottles of 60 Chewable Tablets (Item 279150)

Store At 59° - 86°F (15° - 30° C)

CAUTION: Federal law restricts this drug to use by or on the order of a licensed veterinarian.



0012279160XXX999

LOT NO.: XXX999 EXP. DATE: 99 9999

NDC Code



CONTENTS MADE IN CANADA Manufactured For: MERIAL LIMITED DULUTH, GA 30096 U.S.A.

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PREVICOX™

(firocoxib) 227mg Chewable Tablets

Contains:

24 Bottles of 60 Chewable Tablets (Item 279140)

Store At 59° – 86°F (15° – 30° C)

CAUTION: Federal law restricts this drug to use by or on the order of a licensed veterinarian.



0012279160XXX999

LOT NO.: XXX999 EXP. DATE: 99 9999

NDC Code



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PREVICOX™

(firocoxib) 57mg Chewable Tablets

Contains:

12 Trays of 6 X 30 Chewable Tablets (Item 279120)

Store At 59° - 86°F (15° - 30° C)

CAUTION: Federal law restricts this drug to use by or on the order of a licensed veterinarian.

Qty: 0012 ITEM NO.: 279120 LOTNO.: XXX999



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LOT NO.: XXX999 EXP. DATE:

99 9999

NDC Code



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1025-1826-00 Rev 03-2004

PREVICOX™ (firocoxib) 227mg Chewable Tablets

Contains:

12 Trays of 6 X 30 Chewable Tablets (Item 279130)

Store At 59° - 86°F (15° - 30° C)

CAUTION: Federal law restricts this drug to use by or on the order of a licensed veterinarian.

Qty: 0012 ITEM NO.: 279130 LOTNO.: XXX999

FPO

0012279160XXX999

LOT NO.: XXX999 EXP. DATE: 99 9999

NDC Code



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1025-1827-00 Rev. 03-2004

PREVICOX™ (firocoxib) 57mg Chewable Tablets

Contains:

12 Trays of 10 X 10 Chewable Tablets (Item 279160)

Store At 59° - 86°F (15° - 30° C)

CAUTION: Federal law restricts this drug to use by or on the order of a licensed veterinarian.

Qty: 0012 ITEM NO.: 279160 LOTNO.: XXX999

FPO 0012279160XXX999 LOT NO.: XXX999 EXP. DATE: 99 9999

NDC Code



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1025-1824-00 Rev. 03-2004

PREVICOX™ (firocoxib) 227mg Chewable Tablets

Contains:

12 Trays of 10 X 10 Chewable Tablets (Item 279170)

Store At 59° - 86°F (15° - 30° C)

CAUTION: Federal law restricts this drug to use by or on the order of a licensed veterinarian.

Qty: 0012 ITEM NO.: 279170 LOTNO.: XXX999



0012279160XXX999

LOT NO.: XXX999 EXP. DATE: 99 9999

NDC Code



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